

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:_
DATE FILED: 1/21/2025

January 21, 2025

VIA ECF

The Honorable Mary Kay Vyskocil United States District Judge United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Aminov et al., 23-CR-110 (MKV)

Dear Judge Vyskocil:

I write regarding my representation of Ms. Christy Corvalan in the above-captioned matter. Ms. Corvalan was sentenced by this Court on December 2, 2024. Ms. Corvalan will surrender to her assigned facility on April 30, 2025, and remains under the supervision of U.S. Pretrial Services until that date. At this time, I am respectfully requesting two amendments to Ms. Corvalan's bail conditions to accommodate family responsibilities before her surrender date.

First, Ms. Corvalan hopes to join family and friends in attending her older daughter's baby shower on Sunday, January 26th, located at an event center near her home whose address is known to both U.S. Pretrial Services and the government. Ms. Corvalan was advised by U.S. Pretrial Services to receive Court authorization to attend a social gathering of this nature because it is outside the scope of her work responsibilities and is therefore not covered by her bail conditions. She is hoping to receive permission to leave her house by 11:00 a.m. and return by 10:00 p.m., in order to have enough time to set up, attend, and clean up after the baby shower.

The second request concerns two college visits for Ms. Corvalan's younger daughter. The details of the visits would be as follows. Ms. Corvalan is hoping to visit the University of South Carolina on Tuesday, February 25, 2025, on a pre-scheduled college visit. If permitted to travel by plane, she will be leaving LGA on the morning of February 24, 2025, and arriving in Charlotte (CLT) that same day. She would return on February 26, 2025, leaving CLT that night and arriving at LGA around 8:00 pm to return home. The exact details of Ms. Corvalan's travel plan are known to both U.S. Pretrial Services and the government. The purpose of flying into Charlotte, North Carolina, is so Ms. Corvalan can stay at her sister's residence in Mooresville, NC, for both the night of February 24th and the night of February 25th. Ms. Corvalan's sister will allow her to borrow her car for the two-hour commute to campus each way. If the Court would grant the travel request but prefers that Ms. Corvalan travel by car, then she could instead drive the 11.5 hours to the USC campus from New York, also traveling from February 24th to February 26th and staying with her sister on both nights.

Ms. Corvalan is also hoping to visit Syracuse University for a pre-planned college visit on Thursday, February 27, 2025. She plans to drive with family each way on that day, leaving her residence in the morning and returning at night that same day.

Case 1:23-cr-00110-MKV Document 420 Filed 01/21/25 Page 2 of 2

The Government, through AUSA Jeffrey Coyle, takes no position on these requests. U.S. Pretrial Services, through Officer Jessica Aguilar-Adan, has no objection to Ms. Corvalan's baby shower request, provided that she returns home by 10:00 pm on January 26th. Regarding the request for the college visits, per their policy, U.S. Pretrial Services takes no position but notes that Ms. Corvalan has been compliant and has incurred no issues since being transitioned to GPS monitoring.

Thank you for the Court's consideration of this request.

Respectfully submitted,

/s/

Aaron Mysliwiec
Attorney for Christy Corvalan

Defendant's request for temporary bail modifications is GRANTED on the condition that Defendant provides Pretrial Services with her precise itinerary, including any flight or travel information, in advance of each of the three events; Defendant checks-in with her Pretrial Services Officer upon her departure and return; and finally, if Defendant has a passport, she must surrender it to Pretrial services on or before January 24, 2025.

The Clerk of Court is respectfully requested to terminate the motion pending at docket entry 417.

SO ORDERED.

Date: _______

New York, New York

| Mary Kay Viskocil